

Three High Ridge Park
Stamford, CT 06905

CITIZENS
communications



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October 6, 1997

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket 96-45 -- Nomination For Membership on the Federal-State Joint
Board's Rural Task Force

Dear Mr. Caton:

By Public Notice dated September 17, 1998, FCC 97J-1, the Federal-State Joint Board has solicited nominations for service on its Rural Task Force ("RTF"). By this letter, Citizens Utilities Company, on behalf of its incumbent local exchange carrier subsidiaries (the "Citizens LECs"), wishes to nominate Dwayne Dowtin, its Director-Federal Regulatory, for the RTF as a representative of "rural telephone companies," as defined in Section 3(47) of the Communications Act of 1934, as amended. The Citizens LECs are the only group of totally rural telephone companies that are also price cap regulated by the Federal Communications Commission ("FCC"). Therefore, we believe the Citizens LECs and Mr. Dowtin will offer a unique perspective towards the challenges faced by the RTF.


Mr. Dowtin and the Citizens LECs have been intimately involved in the FCC's universal service and many other critical proceedings spurred by the Telecommunications Act of 1996. In particular, he has done extensive work in the development of cost-based pricing concepts for use in determining the mechanisms for universal service in rural and high cost areas. Mr. Dowtin has already been involved in evaluating some of the different universal service proxy models that have been presented to the FCC. Furthermore, in preparation for operating in a competitive environment, the Citizens LECs have built an extensive cost of service model. Through his participation in the RTF, Mr. Dowtin will bring that expertise to the task force.

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The contemplated transition to a forward looking cost-based universal service for rural telephone carriers will be extremely complicated. Mr. Dowtin and the Citizens LECs look forward to the challenges and would appreciate the opportunity to assist the RTF in fulfilling its mission.

Mr. Dowtin's resume is included with this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Wayne Lafferty", written in a cursive style.

F. Wayne Lafferty
Vice President - Communications Sector Regulatory

Enclosure

Distribution List

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16th Floor, 6 Paul Street
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Dwayne Dowtin
Citizens Communications
Suite 500, 1400 16th St. N.W.
Washington, D.C. 20036

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QUALIFICATIONS

Over 15 years experience in Telecommunications, Broadcasting/Radio, background in regulatory affairs and local exchange carrier relations, specializing in strategic planning/business development, legislative/regulatory tracking and market research. Extensive experience in financial analysis, restructuring and productivity improvement through activity analysis, business process analysis, activity based cost systems and performance measurement.

PROFESSIONAL EXPERIENCE

Regulatory Experience

Director of Federal Regulatory, Citizens Communications, 4/96 -present

- Responsible for the development and integration of regulatory strategy, federal telecommunications legislation and public policies that have impact across the Citizens local exchange subsidiaries.
- Responsible for the analysis of current and anticipated competition in selected jurisdictions and markets; to assess impact on rates for residential and business customers.
- Represents the Telecom Sector before FCC, Congressional members, The United States Telephone Association, as a member of regulatory policy and other committees dedicated to regulatory issues and advocacy.

Adjunct Professor, Communication Law, Bowie State University, Bowie, MD

- Course curriculum includes analysis of Telecommunications Act of 1996, Historical Perspective of Federal Regulations in Broadcasting & Telecommunications; 1/95-Present.

Sr. Telecommunications Policy Analyst, Federal Communications Commission, Office of Communications

Business Opportunity, 1/95-4/96

- Responsible for advising and making recommendations to the Bureau's and the Chairman on all matters affecting business opportunities for small business, minorities and woman in the licensing and regulation of radio, cable TV, broadcast satellite, mobile radio, cellular, PCS, telephone, and other emerging technology offerings.
- Responsible for general economic theory, preparing relevant economic, technological, and regulatory information affecting the Bureaus regulatory policy on the industry.
- Utilization of financial models to analyze investment strategies in connection with wireless & wireline telecommunications offerings, (i.e., PCS infrastructure buildout, merging of wireless .
- Reviewed Commission Agenda items in Circulation on topics including Access, Local Transport, Interconnection, Unbundling the Local Network, FCC's Attribution Rules, Broadcast Ownership.

Financial Management Experience

Sr. Economist, Bell Atlantic 9/92-12/94, Product Profitability Systems

- Responsible for the design, development, and implementation of cost studies which identify direct/indirect cost allocation for product profitability.
- Responsible for analyzing business cases of potential product offerings and developing cost tables for proposal submissions for the Federal Systems Organization.
- Utilization of financial models to analyze product revenue components, and technical cost profiles .

Sr. Financial Analyst, Bell Atlantic 5/88-9/92, Purchasing Department

- Responsible for procurement of \$20.5 million dollar contract base.
- Development of pricing and cost data for RFQs, RFIs, Trial Agreements.
- Performed technical & economic evaluations using the business case financial modeling process for supplier products.
- Developed methods and procedures for identifying all cost incurred by purchasing for the provisioning for new CPE products.

Purchasing Manager, Bell Atlantic 4/87-5/88, Purchasing/Contract Administration

- Responsible for coordinating, directing and performing risk analysis on contract solicitations for AIN products and services.
- Prepare contractual correspondence, interface as liaison for Purchasing with Bell Atlantic's legal counsel.
- Monitor contract deliverables/performance based on FAR/CAS requirements.
- Supervised 12 contract agents, with an operating budget of \$357,000.

Financial Analyst, Bell Atlantic 4/85-4/87, Materials Management

- Responsible for conducting financial studies relating to all phases of the Transportation Services Organization.
- Coordinated Supplier interface for Common Carrier contracted services.
- Developed long and short range business cases designed to forecast operations strategies, resource allocation, capacity planning, inventory levels, systems integration.

Marketing Management Experience

Marketing Manager, Bell Atlantic 2/84-4/85, Operator Services

- Responsible for the management of the Call Completion Product line.
- Project management of business case proposals, scheduling, organizing and coordinating strategy
- Development for implementation of Calling Card Service.
- Coordinated all supplier interface for product proposal activity.

EDUCATION

George Mason University, Fairfax, VA.

Masters degree in Telecommunications Management, May 1993.

George Washington University, Washington, DC.

Professional Certification in Telecommunications Management, May 1987.

Morgan State University, Baltimore, MD.

MBA degree with a concentration in Marketing Management, May 1985.

Cornell University, Ithaca, NY.

Bachelor of Science, in Economics and Business Management, May 1980.